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October 9, 2017

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Commissioner Brendan Carr

Commissioner Jessica Rosenworcel

c/o Marlene H. Dortch, Secretary

Federal Communications Commission

445 12th Street, S.W.

Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via  
Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly,  
Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of Kansas City Repertory Theatre, located in Kansas City, Missouri, that provides approximately 225 performances per year to 640,000 audience members since our 2009-2010 season, and education programs to over 68,121 students. I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. KCREP's mission statement reads: Kansas City Repertory Theatre pursues theatrical excellence and advances the art form, creating and sharing stories at the center of the nation's creative crossroads. KCREP cultivates passionate audiences, artists, and advocates who are interested in our region's future. We build community by connecting people through productions and programming that educate, entertain, challenge, and inspire.

We strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

Kansas City Repertory Theatre uses Wireless Hand Held mics and Body Mics (554-590 MHz) TV Band 33 as well as Wireless Comm (TX 518-536 MHz, RX 668-686 MHz) TV Bands 23-24, 47-48 with controlling devices RC4 2.4 GHz, ISM Band, WIFI Routers, 2.4 GHz, Motors (2.4 and 5GHz). We typically use 4-20 units per performance (depending on how many performers are in each production) with 8-10 performances weekly from August through May. While we do not use any VHF channels we do use Low UHF channels 23, 24, and 33 as well as HIGH UHF channels 47-49.

Our units are able to tune to more than one frequency with a tuning ability as wide as 36 MHz. a few of our units are outside the TB Bands and use 2.4 GHZ ISM Band. All of KCRep's units are analog and while we own our equipment, we do rent wireless units regularly to augment our inventory. Reasonable life expectancy per unit is 36-48 months. Making the change out of the 700 MHz band would cost our organization more than \$15,000.

We believe the FCC could ensure that wireless microphone users transition to new, more efficient decives to the fullest extent possible if they stopped selling frequencies, or if they offered grant money to organizations like KCRep to make the requested upgrades.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

I appreciate that the Commission has sought Public Comment on this very important issue. Professional performing arts organizations and educational institutions should have access to reliably available spectrum with interference protection. I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my organization's sound equipment. Once that investment has been made, I would like some assurance that the system will work properly and without interference.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and providing education, enlightenment, and entertainment. They also contribute to local economies in every community across this country. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,



Angela Lee Gieras  
Executive Director